



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/SKW/EHS
F. #2022R00326

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 17, 2022

By Email and ECF

Mia Eisner-Grynberg, Esq.
Deirdre D. von Dornum, Esq.
Amanda David, Esq.
Federal Defenders of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, New York 11201

Re: United States v. Frank James
Criminal Docket No. 22-214 (WFK)

Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The discovery is being produced pursuant to the Protective Order entered by the Court on July 15, 2022. The government again requests reciprocal discovery from the defendant.

I. The Government's Discovery

A. Documents and Tangible Objects

Bates Numbers	Description
FJ_0015329 - FJ_0015351	Records from Google
FJ_0015352 - FJ_0015354	Records from Yahoo
FJ_0015355 - FJ_0015357	New York City Police Department ("NYPD") Crime Scene Unit ("CSU") scan of the N train subway car
FJ_0015358 - FJ_0015371	Records from Safeguard Self Storage
FJ_0015372	Records from T-Mobile

As noted previously, you may examine any physical evidence discoverable under Rule 16, including original documents, by contacting me to arrange a mutually convenient time.

B. Reports of Examinations and Tests

Bates Numbers	Description
FJ_0015373 - FJ_0015380	NYPD Police Laboratory, Criminalist Section, Requests for Examinations

The government will provide you with copies of additional reports of examinations or tests in this case as they become available.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/
Ian C. Richardson
Sara K. Winik
Ellen H. Sise
Assistant U.S. Attorneys
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Enclosures

cc: Clerk of the Court (WFK) (by ECF) (without enclosures)